

### REMARKS

Reconsideration and further examination is respectfully requested. Claims 1-15 are currently pending.

Applicants would like to thank the Examiner for the careful consideration that has been afforded to this application and for the Examiner's indicated willingness to combine efforts with the Applicant to find means of accelerating this application. Applicants believe that the above amendments are sufficient to distinguish the claimed invention from the prior art, for at least the reasons provided below. .

#### Rejections under 35 U.S.C. §103

Claims 1-15 were rejected under 35 U.S.C. §103(a) as being unpatentable over MPLS Study Project: Competence Center for ATM Components, Roth et al. (hereinafter "Roth") in view of "Tag Switching Architecture Overview, Rekhter, Y., et al, IEEE Proc., vol. 85, No. 12, Dec. 1977, p. 1973-1983 (hereinafter "Rekhter).

#### Combination of references fails to disclose or suggest the claimed invention

In order to support a rejection under 35 U.S.C. §103, every limitation in the claims should be shown or suggested in the combination of references. In addition, portions of the references which teach away from the claimed invention need to be considered when determining the scope of the prior art.

An important distinction between the claimed invention and the prior art is the fact that the method and apparatus of the claimed invention allows multi-protocol label switching to be performed across autonomous domains without the use of a multi-protocol label stack. Applicants have amended the claims to more particularly highlight this distinction over the references cited by the Examiner. In particular, there is no stacking of labels *even across autonomous system boundaries*.

The Examiner admits, at page 3 of the office action, that 'Roth does not explicitly teach where the border router supports inter-domain routing protocol for communicating between autonomous systems are label switching capable using a single label in the label stack...' The Examiner relies on Rekhter for this teaching.

Rekhter describes, at page 1977, column 2, paragraphs 1-3, in part:

"To support this functionality, tag switching allows a packet to carry not one but a set of tags, organized as a stack. A tag switch could swap the tag at the top of the stack, pop the stack, or swap the tag and push one or more tags into the stack.

Consider a tag switch that is at the border of a routing domain. This switch maintains both exterior and interior routes. The interior routes provide routing information and tags to all the other tag switches within the routing domain. For each exterior route that the switch receives from some other border tag switch that is in the same domain as the local switch, the switch maintains not just a tag associated with that route but also a tag associated with the route to the other border tag switch...

"... When a packet is forwarded between two (border) tag switches in different domains, the tag stack in the packet contains just one tag (associated with the exterior route). When a packet is forwarded within a domain, however, the tag stack in the packet contains not one but two tags (the second tag is pushed by the domain's ingress border tag switch and is associated with an interior route to the egress border tag switch). The tag at the top of the stack provides packet forwarding to an appropriate egress border tag switch, while the next tag in the stack provides correct packet forwarding at the egress switch. The stack is popped by either the egress switch or by the penultimate ... switch...."

Such a teaching illustrates the problem which the present invention overcomes. Applicants have amended the claims to clarify that the single label stack is received at a border router from an interior router. Accordingly, the claims are patentably distinct over the combination of Roth and Rekhter. Therefore, for at least the reason that the combination of references fails to describe or suggest every limitation of claims 1, 6 and 11, the claims are patentable over the art and the rejection should be withdrawn. Dependent claims 2-5, 7-10 and 12-15 serve to add further patentable limitations to their parent claims, and are allowable for at least the same reasons as the parent independent claims.

Conclusion

Applicants have made a diligent effort to place the claims in condition for allowance, yet recognize that entry of this response is at the discretion of the Examiner. Should there remain unresolved issues that require adverse action, it is respectfully requested that the Examiner telephone Lindsay McGuinness, Applicants' Attorney at (978) 264-6664 so that such issues may be resolved as expeditiously as possible.

For these reasons, and in view of the above amendments, this application is now considered to be in condition for allowance and such action is earnestly solicited.

Respectfully Submitted,

April 3, 2006

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Attorney Docket No.: 120-046